In Re:	Chapter 11
Yehud-Monosson USA, Inc.	Case File No.: 11-42834 (NCD)
Debtor,	Cuse The 110

## DEBTOR'S NOTICE OF EXPEDITED MOTION TO CONTINUE HEARING ON DECEMBER 6, 2011

TO: The debtor and other entities specified in Local Rule 9013-3.

- 1. Debtor Yehud-Monosson USA, Inc. moves the court for the relief requested below and gives notice of hearing.
- 2. The hearing will be held on December 6, 2011, at 3:00 p.m. before the United States Bankruptcy Court, Courtroom 7W, 300 South Fourth Street, Minneapolis, MN 55415.
- 3. Any response to this motion must be filed and served by no later than the time of hearing. UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.
- 4. This court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334, Fed. R. Bankr. P. 5005 and Local Rule 1070-1. This proceeding is a core proceeding. The case is now pending in this court.
- 5. This motion arises under 11 U.S.C. §§ 105(a) and 324(a). This motion is filed under Fed. R. Bankr. P. 9014 and Local Rules 9006-1(e) and 9013-1. Movant requests relief with respect to its request that the hearing date be rescheduled for a time when Debtor's counsel is able to fully review all documents produced and prepare for this matter.

6. Debtor's supporting motion follows.

Dated this 5<sup>th</sup> day of December, 2011.

WESTVIEW LAW CENTER, PLC

/e/ Rebekah M. Nett Rebekah M. Nett, 0299571 1303 South Frontage Road, Suite 1 Hastings, MN 55033 Attorney for Debtor

#### Verification

I, Naomi Isaacson, the moving party (or the managing member of the corporation movant, or a partner of the partnership movant) named in the foregoing notice of hearing and motion, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information and belief.

Executed on: December 5, 2011 Signed:

Naomi Isaacson,

President

Yehud-Monosson USA, Inc.

In Re:	Chapter 11			
Yehud-Monosson USA, Inc.				
Debtor,	Case File No.: 11-42834 (NCD)			
DEBTOR'S EXPEDITED MOTION TO CONTINUE HEARING ON DECEMBER 6, 2011				
PLEASE TAKE NOTICE that Yehud-Monosson USA, Inc., the Debtor in the above-				
captioned matter, is filing a motion with this Court for the relief set forth below.				
1. Ordering that the hearing sched	duled for December 6, 2011 at 3:00 p.m. with			
respect to the Chapter 7 Trustee's Motion for	Contempt shall be continued until the end of the			
month in order to permit Debtor's principal of	fficer, Naomi Isaacson, to retain counsel to defend			
herself from the court-appointed Chapter 7 Tr	rustee Nauni Manty's intentional and deceitful			
allegations against the Debtor.				
2. Finding that this expedited more	tion is necessary due to the fact that hearing is			
scheduled for tomorrow.				
3. This Court has jurisdiction to	hear this matter under 28 U.S.C. § 1334 and under			
28 U.S.C. § 157(a) and 28 U.S.C. § 157(b).				
4. Based on the foregoing, Debto	r requests the emergency relief set forth herein.			
Dated this 6 <sup>th</sup> day of December, 2011	WESTVIEW LAW CENTER, PLC			
	/e/ Rebekah M. Nett Rebekah M. Nett, 0299571			

1303 South Frontage Road, Suite 1

Hastings, MN 55033 Attorney for Debtor

In Re:	Chapter 7
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Yehud-Monosson USA, Inc.

Case File No.: <u>11-42834 (NCD)</u>

Debtor,

#### **DECLARATION OF NAOMI ISAACSON**

Naomi Isaacson, being duly sworn, deposes and says:

- 1. I am the President of Yehud-Monosson USA, Inc. ("Yehud-Monosson"). I make this affidavit in support of a motion to continue the December 6, 2011 hearing in order to allow me time to retain an attorney to represent me in this motion.
- 2. The media in Minnesota and Wisconsin and even across the country, through the influence of the church and its personnel, where either the church owns the media under layers of deceit or they are major stockholders undercover, has saturated Minnesota and Wisconsin with negative propaganda against the Debtor and its personnel. Due to the saturation of intentional negative publicity against this Debtor and its personnel, which has been targeted to hurt the Debtor and its personnel financially, sociologically and psychologically and ultimately to remove them from daily functionality, I, as Debtor's principal officer, have been unsuccessful in retaining an attorney to defend myself from the court-appointed Chapter 7 Trustee Nauni Manty's intentional and deceitful allegations against the myself and the Debtor in the pending Motion for Contempt and request for incarceration.

3. I am requesting the Court to give me until the end of month in order to obtain such representation.

NAOMI ISAACSON

**PRESIDENT** 

YEHUD-MONOSSON USA, INC.,

In Re:		Chapter 11		
Yehud	d-Monosson USA, Inc.  Debtor,	Case File No.: 11-42834 (NCD)		
ORDER				
The Debtor's expedited motion to continue the December 6, 2011 hearing in order to permit Debtor's principal officer, Naomi Isaacson to retain counsel to represent her interests in the pending motion. Based on the motions, the files, and the record of the proceedings,				
IT IS ORDERED:				
1.	Relief is granted.			
2.	2. The hearing on the Chapter 7 Trustee's Motion for Contempt shall be continued from			
Dated:	December 6, 2011 to, 2011 at : December, 2011	m.		
	United	d States Bankruptcy Judge		

In Re:	Chapter 11	
Yehud-Monosson USA, Inc.	Case File No.: 11-42834 (NCD)	
Debtor,		

### UNSWORN CERTIFICATE OF SERVICE

I, Rebekah M. Nett, do hereby certify that on the 6<sup>th</sup> day of December, 2011, a true and correct copy of the *Notice of Hearing, Expedited Motion to Continue Hearing on December 6*, 2011, Declaration of Naomi Isaacson and Proposed Order were filed with the United States Bankruptcy Court on December 6, 2011, thereby generating electronic service upon the parties indicated below.

#### **CM/ECF:**

Jeff C Braegelmann on behalf of Defendant American Bank of St. Paul <a href="mailto:jbraegelmann@gislason.com">jbraegelmann@gislason.com</a>

John E Brandt on behalf of Interested Party William Egan jbrandt@murnane.com

Roylene A Champeaux on behalf of Interested Party UNITED STATES OF AMERICA IRS Roylene.Champeaux@usdoj.gov, karen.malikowski@usdoj.gov; usamn.ecfbankruptcy@usdoj.gov; darcie.boschee@usdoj.gov

Michael S. Dove on behalf of Interested Party American Bank of St. Paul mdove@gislason.com, KGleisner@gislason.com; JBurgau@gislason.com

Michelle K. Dove on behalf of Trustee Nauni Manty michelle@mantylaw.com, carisa@mantylaw.com

David Jon Hoiland on behalf of Interested Party Lubrication Technologies, Inc. Hoilandesq@aol.com, ymailer@e-lawfirm.com

Michael J Iannacone on behalf of Creditor VERMILLION STATE BANK mji@iannacone.com, miannacone@ecf.epiqsystems.com; knt@iannacone.com; trustee@iannacone.com

Colin Kreuziger on behalf of U.S. Trustee US Trustee Colin.Kreuziger@usdoj.gov

Nauni Jo Manty ecf@mantylaw.com, mn12@ecfcbis.com

Manty & Associates PA on behalf of Trustee Nauni Manty ecf@mantylaw.com

Tyler K Olson on behalf of Interested Party Tiger Peg Capital Corp. <a href="mailto:tolson@oppenheimer.com">tolson@oppenheimer.com</a>

Randall L. Seaver rlseaver@fullerseaverramette.com, rseaver@ecf.epiqsystems.com

US Trustee ustpregion12.mn.ecf@usdoj.gov

Dated this 6<sup>th</sup> day of December, 2011.

WESTVIEW LAW CENTER, PLC

/e/ Rebekah M. Nett

Rebekah M. Nett, 0299571 1303 South Frontage Road, Suite 1 Hastings, MN 55033 Attorney for Debtor